

GEF:hh
4/30/19

IN THE BANKRUPTCY COURT OF THE UNITED STATES
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF:

CHAPTER 11 BANKRUPTCY

WESTERN RESERVE WATER
SYSTEMS, INC.

CASE NO. 19-11864

Debtor

JUDGE JESSICA PRICE SMITH

VERIFIED STATEMENT OF PROPOSED CONSULTANT

DAVID GOUTTIERE, the undersigned, states and declares under penalty of perjury as follows:

1. That he is a consultant in the State of Ohio and practices consulting in the consulting firm of FocusCFO at 1010 Jackson Hole Drive, Suite 202, Blacklick, OH 43004.

2. That he and his consulting firm have no connection with the Debtor, creditors, any other parties in interest in this case, their respective attorneys or Consultants, the United States Trustee, or any person employed in the office of the United States Trustee, or any Bankruptcy Judge except that the said Consultant has represented the Debtor previously, including the preparation and filing of tax returns and other filings is acquainted with the Debtor's management, and is familiar with the Debtor's business operation and financial affairs.

3. That he and his consulting firm, [waiving their claims against the Debtor's estate,] are disinterested persons, as that term is defined in the Bankruptcy Code, and do not hold or represent an interest adverse to the estate with respect to the matter on which they are proposed to be employed.

4. That he and his consulting firm have entered into a written Agreement dated April 22, 2019 with WESTERN RESERVE WATER SYSTEMS, INC, the Debtor, regarding the services to be performed for

the Debtor in connection with this case and the compensation to be paid for such services, a copy of which is attached to the Debtor's Application For Order Approving Employment of Consultant that has been filed with the Court in this case.

5. That he and his consulting firm have not shared or agreed to share any portion of the compensation paid or to be paid in connection with this case with any other persons except members or associates of the consulting firm of FocusCFO at 1010 Jackson Hole Drive, Suite 202, Blacklick, OH 43004.

Dated: 4/30/19

/s/ David Gouttiere
DAVID GOUTTIERE
Consultant for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2019, a true and correct copy of the within Notice of Application to Appoint Consultant was served via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

US Trustee at Registereduser@usdoj.gov
Amy L. Good, US Trustee's Office, Amy.L.Good@UST.DOJ.GOV
Michael P. Shuster for Creditor KeyBank National Association, mshuster@porterwright.com
Rodd A. Sanders for Creditor C&K Industrial Services, Inc. rsanders@sonkinkoberna.com

Rodd A. Sanders for Creditor JAG Development, LLC rsanders@sonkinkoberna.com

20 Largest Unsecured Creditors:

AETNA PLASTICS CORP.
P.O. BOX 931780
Cleveland, OH 44193

BENOVATION
2035 READING RD.
Cincinnati, OH 45202

BONDED CHEMICALS
1125 SOLUTIONS CENTER
Chicago, IL 60677

CHEMTREAT, INC
15045 COLLECTIONS CENTER
Chicago, IL 60693

ENPRESS, LLC
34899 CURTIS BLVD
Eastlake, OH 44095

ENVIROSERVE
PO BOX 413070
Salt Lake City, UT 84141

FILMTEC CORPORATION
4118 COLLECTION CENTER DR
Chicago, IL 60693

GCS WATER PURIFICATION,
LLC
PO BOX 703
Rosharon, TX 77583

KELLY SERVICES, INC.
PO BOX 820405
Philadelphia, PA 19182

Key Bank
127 Public Square
Cleveland, OH 44114

METTLER-TOLEDO INGOLD
23669 NETWORK PLACE
Chicago, IL 60673

NEORS
PO BOX 94550
Cleveland, OH 44101

OTP INDUSTRIAL SOLUTIONS
PO BOX 73278
Cleveland, OH 44193

PUROLITE COMPANY
PO BOX 824075
Philadelphia, PA 19182

RESINTECH
1 RESINTECH PLAZA
160 COOPER ROAD
West Berlin, NJ 08091

REXEL OF AMERICA, LLC
PO BOX 742833
Atlanta, GA 30374-2833

SUEZ WTS USA, INC
12822 COLLECTION CENTER
DRIVE
Chicago, IL 60693

TALENT TRANSPORTATION,
INC.
PO BOX 361159
Strongsville, OH 44136

WATER SURPLUS
PO BOX 2668
Loves Park, IL 61132

WSM
580 GOLDEN OAK PARKWAY
Oakwood Village, OH 44146

Respectfully submitted,

/s/ Glenn E. Forbes
Glenn E. Forbes, Esq. (0005513)
Attorney for Debtor(s)
FORBES LAW LLC
166 Main Street
Painesville, OH 44077
(440) 357-6211
gforbes@geflaw.net
bankruptcy@geflaw.net